Committee to also pursue a policy and environmental approach to addressing obesity. Last year, AHA released a scientific statement entitled Population-Based Prevention of Obesity: The Need for Comprehensive Promotion of Healthful Eating, Physical Activity, and Energy Balance (See Attachment B). We believe this statement may be of use to the Committee.

Nutrient Density/Discretionary Calories

Nutrient Density

Consumers should focus on the consumption of nutrient-dense calories that meet the Dietary Guidelines. To do this, individuals should consume a variety of fruits, vegetables, and whole grain products; choose fat-free and low-fat dairy products, legumes, poultry, and lean meats; and eat fish, preferably oily fish, twice a week. The recommendations should be specific for the types of nutrient-dense foods that should be consumed, and emphasize the need to limit consumption of high calorie foods with low nutritional value such as sugars and saturated and *trans* fats.

Discretionary Calories

The concept of discretionary calories is difficult to understand. While discretionary calories provide beneficial flexibility in the diet, people do not understand discretionary calories limits. In order for individuals to have discretionary calories available, they must limit foods of low nutritional value and caloric intake must be in balance with caloric expenditure.

Unfortunately the majority of the American population is too sedentary and they do have discretionary calories to burn. The recommendations should continue to emphasize this point and the Committee should explore new ways to make the discretionary calories concept more consumer-friendly.

Evidence-Based Review Process

AHA applauds the use of the new Nutrition Evidence Library in the development in the 2010 Dietary Guidelines. The Nutrition Evidence Library will be a valuable resource to the Advisory Committee and will ensure that the dietary recommendations are based on a comprehensive scientific review. We commend the USDA and HHS for bringing the process to this level of scientific rigor.

Other

Development Process

The development of the Dietary Guidelines occurs in three stages: first, the Advisory Committee prepares a report of recommendations; second, USDA and HHS jointly develop a Policy Document of key recommendations based on the Advisory Committee's report and outside comments; and third, USDA and HHS develop messages to communicate the Dietary Guidelines to the public.

AHA understands that once the first stage is completed – the Advisory Committee submits its scientific recommendations to USDA and HHS – the Committee is disbanded. It is our further

understanding that once the Committee is disbanded, there is no mechanism to allow the USDA and HHS staff charged with developing the Policy Document and Consumer Brochure to communicate with Committee members. AHA recommends that this process be revised and a mechanism be established to allow for communication between the Committee and USDA and HHS staff. A communication mechanism will allow USDA and HHS staff to ask questions and seek clarification from Committee members to ensure that they are correctly translating the science-based recommendations into policy. The Canadian model of forming a communications committee at the same time as the science committee may be a useful model for USDA and HHS to consider.

Communication with the Public

As previously mentioned, AHA is very pleased with the opportunity to provide comments on the 2010 Dietary Guidelines and we are confident that the Committee will develop a set of strong, science-based recommendations designed to help consumers form healthy eating patterns, increase their physical activity, and reduce the risk of chronic disease. However, in order for the Dietary Guidelines to be of use, they must be communicated to the public properly. We cannot overemphasize that communication with the public is key.

The Committee and USDA and HHS staff must give significant thought on how to communicate the recommendations to the public. The messaging must focus on helping consumers translate the Dietary Guidelines into their normal, everyday lives. Implementation of the Guidelines should encourage consumers to look broadly at their whole diet and dietary patterns. In addition, all messaging should tie-in to the broader message around weight control and energy balance.

Closing

In closing, we reiterate our appreciation for the opportunity to provide comments on the 2010 Dietary Guidelines. The Dietary Guidelines are a valuable source of nutrition information for policy makers, health care providers, nutritionists, and the public, and we support the efforts of the Committee, USDA, and HHS to develop updated recommendations that will promote the health of Americans. Raising the public's awareness of the benefits of a healthy diet and active lifestyle is an important strategy for reducing the incidence and risk of cardiovascular disease, stroke, and other chronic diseases. We hope that as the public learns more about the relationship between diet and disease, consumers will try to adopt a healthier lifestyle and make better food choices.

If you have any questions or need any additional information, please do not hesitate to contact Susan Bishop, MA, Regulatory Affairs Manager, at 202-785-7908 or susan.k.bishop@heart.org.

Sincerely,

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Jim My & Bardue

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